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May 20, 2019

**Via ECFS**

Marlene J. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street SW  
Washington, DC 20554

**Re: PPL Electric Utilities Corporation's Responses to Complainant's Revised  
First Set of Interrogatories (Proceeding Number 19-29; Bureau ID  
Number EB-19-MD-001)**

Ms. Dortch:

Please find attached defendant PPL Electric Utilities Corporation's Responses to Complainant MAW Communications, Inc.'s Revised First Set of Interrogatories in Proceeding Number 19-29; Bureau ID Number EB-19-MD-001.

Sincerely,



Timothy A. Doughty  
Attorney for PPL Electric Utilities Corporation

Enclosures

cc: Lisa Saks, Enforcement Bureau  
Adam Suppes, Enforcement Bureau

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

_____	)	
	)	
<b>MAW Communications, Inc.,</b>	)	
<i>Complainant,</i>	)	
	)	<b>Proceeding Number 19-29</b>
<b>v.</b>	)	<b>Bureau ID Number EB-19-MD-001</b>
	)	
<b>PPL Electric Utilities Corporation,</b>	)	
<i>Defendant</i>	)	
_____	)	

**PPL ELECTRIC UTILITIES CORPORATION’S RESPONSES  
TO COMPLAINANT’S REVISED FIRST SET OF INTERROGATORIES**

Defendant PPL Electric Utilities Corporation (“PPL”), pursuant to the Notice of Formal Complaint issued February 14, 2019 by the FCC Enforcement Bureau in this proceeding and pursuant to Section 1.730 of the Commission’s Rules, 47 C.F.R. §1.730, submits the following Responses to the Revised First Set of Interrogatories of Complainant MAW Communications, Inc. (“MAW”) to PPL.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1:**

Identify any and all documents in your possession created on or after June 1, 2015, relating to MAW lines or equipment that can be searched electronically and refer to NESC Rule 214, by witness and date and include a brief description of the contents of each identified document.

**RESPONSE:** See Exhibit A.

### **INTERROGATORY NO. 2:**

Describe in detail the information that PPL contends is missing from each of MAW's 18 applications that PPL has marked "Incomplete."

**RESPONSE:** As explained in PPL's Response to MAW's Complaint, MAW's 18 applications were not part of a holistic solution to the many problems associated with MAW's attachments. In addition, see the reasons specified in Exhibit B for how each of these 18 applications is incomplete.

### **INTERROGATORY NO. 3:**

Describe PPL's communications with the City or LCSC regarding the correction of recorded defects on City or LCSC attachments to PPL poles.

**RESPONSE:** PPL conducted surveys of its pole plant from 2009 through part of 2013 to look for unauthorized attachments. Those surveys covered PPL poles in Lancaster during the periods January-April 2009 and January-March 2011. Those surveys were not safety inspections, but the auditors were instructed to note any obvious safety violations. For the 2009 survey, PPL found 30 safety violations. PPL sent the City a letter dated October 2, 2009, in which PPL noted these safety violations and instructed the City as follows: “Forward the violation section to your appropriate engineering or construction office to insure that the required electrical clearance corrections will be made within six months of the report date.” The City responded by confirming or not confirming these safety violations on January 28, 2010.

For the 2011 survey, PPL found 31 safety violations. PPL sent the City a letter dated April 15, 2011, in which PPL noted these safety violations and instructed the City as follows: “Forward the violation section to your appropriate engineering or construction office to insure that the required electrical clearance corrections will be made within six months of the report date.”

After a diligent search of its records, PPL is unaware of any other correspondence.

**INTERROGATORY NO. 4:**

Not including the 428 attachments that PPL admits that LCSC transferred to MAW, identify all additional City or LCSC attachments to PPL poles (whether authorized or unauthorized) that are also listed by pole number in MAW’s 2015 survey, attached to MAW’s Reply as Attachment A, Exhibit 3.

**RESPONSE:** Additional City or LCSC attachments to PPL poles may be identified by comparing documents in MAW's possession. The June 8, 2018 email from PPL's Ryan Yanek to MAW's Mindy Wiczowski, which should be in MAW's possession, lists all 428 MAW attachments by pole number and all authorized City and LCSC attachments. The pole numbers associated with the authorized City and LCSC attachments in PPL's June 8, 2018 email can be compared with the pole numbers identified in MAW's Reply as Attachment A, Exhibit 3, to determine pole numbers that are not on the list of 428 poles. Following that comparison, MAW can identify which of the poles have City or LCSC attachments on them.

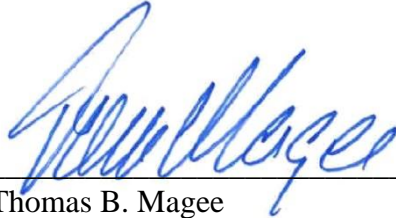
**INTERROGATORY NO. 5:**

5. Describe MAW offers to remediate and/or settle the case not described below:
  - a. June 20, 2018 letter from MAW proposing a 2-step path to authorization for MAW's j-and-raise of the obsolete municipal network and a separate 7-step path to authorization for MAW's single mode fiber network, which MAW clarified and revised in a subsequent letter on June 26, 2018;
  - b. July 11, 2018 correspondence from MAW requesting 180 days to transition the municipal network to a single-mode network;
  - c. August 27, 2018 settlement offer to PPL, building on prior offers and proposing specific solution for all alleged unauthorized attachments (including payment of multiple years of back rent), and adding specific solutions for timing of municipal network conversion from multimode to single node network, and for remedying non-compliance including for separation from streetlights, mid-span clearance issues, supply space issues, and splice boxes on poles;

- d. October 2018 proposed Memorandum of Understanding between MAW and the City to address PPL concerns that certain municipal attachments were not transferred to MAW; and
- e. January 28, 2019 request by MAW for executive-level discussions in an attempt to settle its dispute.

**RESPONSE:** As explained in PPL's Response to MAW's Complaint, there were problems with every single one of these offers. Other offers, if MAW provided any, would be in MAW's possession and, as set forth in the instructions, MAW is not seeking those from PPL.

Respectfully submitted,



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*Attorneys for PPL Electric Utilities Corporation*

May 20, 2019

# EXHIBIT A

	A	B	C	D	E	F	G	I	J	K	L	M
1	Document Type	FileType	From	To	CC	BCC	FamilyDate	Subject	Author	Custodian	Privilege	Document Description
2	Parent	OUTLOOK_MSG	"Shafer, Michael J"[MJShafer@pplweb.com]	Frank Wiczkowski[frank@mawcom.com]; Brad Gorter[bgorter@pa.gov]; Brent Killian[bkillian@pa.gov]; Kristofer Knittle[knittle@pa.gov]	Yanek, Ryan J[RJYanek@pplweb.com]; Jeffrey Franklin[JFranklin@PrinceLaw.com]; Joseph D'Amico[jsdamico@flblaw.com]		12/12/2017 17:07	RE: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		SHAFER_MIKE	No Privilege Designation	Email response to MAW and PUC re: safety concerns and NESC violations
3	Parent	OUTLOOK_MSG	"Shafer, Michael J"[MJShafer@pplweb.com]	Gelatko, Stephen J[sgelatko@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Santayana, Mark Carl[MCSantayana@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]		12/12/2017 17:13	FW: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		SHAFER_MIKE	Attorney-Client Privilege	Email chain re: response to MAW and PUC
4	Parent	OUTLOOK_MSG	"Shafer, Michael J"[MJShafer@pplweb.com]	Joseph D'Amico[jsdamico@flblaw.com]			12/12/2017 17:14	RE: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		SHAFER_MIKE	Attorney-Client Privilege	Email chain re: response to MAW and PUC
5	Attachment	PNG					12/12/2017 17:14			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: response to MAW and PUC
6	Parent	OUTLOOK_MSG	"Shafer, Michael J"[MJShafer@pplweb.com]	Joseph D'Amico[jsdamico@flblaw.com]	Yanek, Ryan J[RJYanek@pplweb.com]		12/14/2017 15:28	MAW Argument		SHAFER_MIKE	Attorney-Client Privilege	Email re: PPL interpretation of the NESC
7	Parent	OUTLOOK_MSG	Reybitz, Ronald J[RJReybitz@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]			12/27/2017 9:26	Re: MAW Argument		SHAFER_MIKE	Attorney-Client Privilege; Work Product	Email chain including PPL response to PUC re: interpretation of NESC
8	Parent	OUTLOOK_MSG	Gelatko, Stephen J[sgelatko@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]		12/27/2017 9:29	RE: MAW Argument		SHAFER_MIKE	Attorney-Client Privilege; Work Product	Email chain including PPL response to PUC re: interpretation of NESC
9	Parent	OUTLOOK_MSG	Gorter, Brad[bgorter@pa.gov]	Shafer, Michael J[MJShafer@pplweb.com]			12/27/2017 9:35	RE: MAW Argument		SHAFER_MIKE	No Privilege Designation	Email chain including PPL response to PUC re: interpretation of NESC
10	Parent	OUTLOOK_MSG	Killian, Brent[bkillian@pa.gov]	Gorter, Brad[bgorter@pa.gov]; McHugh, Timothy[timchugh@pa.gov]	Shafer, Michael J[MJShafer@pplweb.com]		12/27/2017 9:43	RE: MAW Argument		SHAFER_MIKE	No Privilege Designation	Email chain including PPL response to PUC re: interpretation of NESC
11	Parent	OUTLOOK_MSG	Yanek, Ryan J[RJYanek@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Gelatko, Stephen J[sgelatko@pplweb.com]		12/27/2017 11:50	RE: MAW Argument		SHAFER_MIKE	Attorney-Client Privilege; Work Product	Email chain including PPL response to PUC re: interpretation of NESC
12	Parent	OUTLOOK_MSG	Yanek, Ryan J[RJYanek@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]			12/27/2017 13:43	FW: MAW Argument		SHAFER_MIKE	Attorney-Client Privilege; Work Product	Email chain including PPL response to PUC re: interpretation of NESC
13	Parent	OUTLOOK_MSG	Shafer, Michael J[MJShafer@pplweb.com]	Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]; Rippke, Kristie M (Contractor)[KMRippke@pplweb.com]			3/13/2018 9:44	FW: MAW Argument		SHAFER_MIKE	Attorney-Client Privilege	Email chain re: PPL interpretation of NESC
14	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
15	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
16	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
17	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
18	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
19	Attachment	PDF					3/13/2018 9:44			SHAFER_MIKE	Attorney-Client Privilege	Attachment to email chain re: PPL interpretation of NESC
20	Parent	OUTLOOK_MSG	Vinci guerra, Donald[/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=C5016]	Yanek, Ryan J[RJYanek@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]; Joseph D'Amico [jsdamico@flblaw.com][jsdamico@flblaw.com]		7/17/2018 12:45	Concern over mid span to secondary slack on pole 40534525879		SHAFER_MIKE	Attorney-Client Privilege	Email re: great concern about unauthorized cable posing dangerous situation, including images



	A	B	C	D	E	F	G	I	J	K	L	M
21	Parent	OUTLOOK_MSG	Joseph D'Amico[jsdamico@flblaw.com]	Yanek, Ryan J[RJYanek@pplweb.com]; Shafer, Michael J[MJShafer@pplweb.com]; Vinciguerra, Donald[dvinciguerra@pplweb.com]	Dom, Aaron A[AADom@pplweb.com]		7/17/2018 15:04	FW: Concern over mid span to secondary slack on pole 40534525879		SHAHER_MIKE	Attorney-Client Privilege	Email chain re: great concern about unauthorized cable posing dangerous situation, including images
22	Parent	OUTLOOK_MSG	Joseph D'Amico[jsdamico@flblaw.com]	Yanek, Ryan J[RJYanek@pplweb.com]; Shafer, Michael J[MJShafer@pplweb.com]	Vinciguerra, Donald[dvinciguerra@pplweb.com]; Dom, Aaron A[AADom@pplweb.com]		7/17/2018 17:15	Unauthorized/ Unlawful Attachment List- pole 40534525879		SHAHER_MIKE	Attorney-Client Privilege	Email chain re: great concern about unauthorized cable posing dangerous situation, including images
23	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Joseph D'Amico[jsdamico@flblaw.com]; Shafer, Michael J[MJShafer@pplweb.com]; Vinciguerra, Donald[dvinciguerra@pplweb.com]	Dom, Aaron A[AADom@pplweb.com]		7/17/2018 17:16	RE: Concern over mid span to secondary slack on pole 40534525879		SHAHER_MIKE	Attorney-Client Privilege	Email chain re: great concern about unauthorized cable posing dangerous situation, including images
24	Attachment	EXCEL2010					7/17/2018 17:16		Don Vinciguerra	SHAHER_MIKE	Attorney-Client Privilege	Attachment to mail chain re: great concern about unauthorized cable posing dangerous situation, including images
25	Parent	OUTLOOK_MSG	Vinciguerra, Donald[/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=C5016]	Joseph D'Amico[jsdamico@flblaw.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Shafer, Michael J[MJShafer@pplweb.com]	Dom, Aaron A[AADom@pplweb.com]		7/17/2018 17:36	Re: Unauthorized/ Unlawful Attachment List- pole 40534525879		SHAHER_MIKE	Attorney-Client Privilege	Email chain re: great concern about unauthorized cable posing dangerous situation, including images
26	Parent	OUTLOOK_MSG	Joseph D'Amico[jsdamico@flblaw.com]	EWinter@PrinceLaw.com[EWinter@Prince Law.com]; 'Jeffrey Franklin'[JFranklin@PrinceLaw.com]; Neil Albert[nla@zpnalaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]		7/18/2018 8:25	Unauthorized/ Unlawful Attachment Removal List No. 3 - pole 40534525879		SHAHER_MIKE	No Privilege Designation	Email re: great concern about unauthorized cable posing dangerous situation, including images
27	Attachment	EXCEL2013					7/18/2018 8:25			SHAHER_MIKE	No Privilege Designation	Attachment to email re: great concern about unauthorized cable posing dangerous situation, including images
28	Parent	OUTLOOK_MSG	Shafer, Michael J[MJShafer@pplweb.com]	Joseph D'Amico[jsdamico@flblaw.com]			2/15/2019 17:00	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
29	Parent	OUTLOOK_MSG	Joseph D'Amico[jsdamico@flblaw.com]	Thomas B. Magee (magee@khlaw.com)[magee@khlaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Heather Rivera[hrivera@flblaw.com]		2/14/2019 17:33	Maw		SHAHER_MIKE	Attorney-Client Privilege	Email to Tom Magee re: unauthorized attachments and NESC guidelines
30	Parent	OUTLOOK_MSG	Magee, Thomas[Magee@khlaw.com]	Joseph D'Amico[jsdamico@flblaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Heather Rivera[hrivera@flblaw.com]		2/14/2019 17:49	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
31	Parent	OUTLOOK_MSG	Shafer, Michael J[MJShafer@pplweb.com]	Joseph D'Amico[jsdamico@flblaw.com]			2/15/2019 9:05	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
32	Parent	OUTLOOK_MSG	Joseph D'Amico[jsdamico@flblaw.com]	Shafer, Michael J[MJShafer@pplweb.com]			2/15/2019 14:42	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
33	Parent	OUTLOOK_MSG	Heather Rivera[hrivera@flblaw.com]	Magee, Thomas[Magee@khlaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]		2/15/2019 15:56	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
34	Attachment	PDF					2/15/2019 15:56			SHAHER_MIKE	Attorney-Client Privilege	Attachment to email chain including Tom Magee re: unauthorized attachments and NESC guidelines
35	Attachment	EXCEL2013					2/15/2019 15:56		Andrew Bryden	SHAHER_MIKE	Attorney-Client Privilege	Attachment to email chain including Tom Magee re: unauthorized attachments and NESC guidelines
36	Parent	OUTLOOK_MSG	Magee, Thomas[Magee@khlaw.com]	Heather Rivera[hrivera@flblaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]		2/15/2019 16:34	RE: Maw		SHAHER_MIKE	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines

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37	Parent	OUTLOOK_MSG	Silverio, Jose E[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178143]	Yanek, Ryan J[RJYanek@pplweb.com]			8/8/2017 16:53	MAW Communications APPs and Non-compliant Attachments		SILVERIO_JOSE	No Privilege Designation	Email re: two MAW violations for attaching too close to existing facilities
38	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Shafer, Michael J[MJShafer@pplweb.com]	Silverio, Jose E[ESilverio@pplweb.com]		8/8/2017 20:06	FW: MAW Communications APPs and Non-compliant Attachments		SILVERIO_JOSE	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
39	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Silverio, Jose E[ESilverio@pplweb.com]			8/8/2017 20:09	FW: MAW Communications APPs and Non-compliant Attachments		SILVERIO_JOSE	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
40	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Silverio, Jose E[ESilverio@pplweb.com]			8/9/2017 9:07	FW: MAW Communications APPs and Non-compliant Attachments		SILVERIO_JOSE	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
41	Parent	OUTLOOK_MSG	Silverio, Jose E[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178143]	Yanek, Ryan J[RJYanek@pplweb.com]			8/8/2017 16:53	MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	No Privilege Designation	Email re: two MAW violations for attaching too close to existing facilities
42	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Shafer, Michael J[MJShafer@pplweb.com]	Silverio, Jose E (JESilverio@pplweb.com)[JESilverio@pplweb.com]		8/8/2017 20:06	FW: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
43	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Silverio, Jose E (JESilverio@pplweb.com)[JESilverio@pplweb.com]			8/8/2017 20:09	FW: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
44	Parent	OUTLOOK_MSG	Silverio, Jose E[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178143]	Yanek, Ryan J[RJYanek@pplweb.com]			8/9/2017 8:03	RE: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
45	Parent	OUTLOOK_MSG	Shafer, Michael J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Yanek, Ryan J[RJYanek@pplweb.com]			8/9/2017 9:02	RE: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
46	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Shafer, Michael J[MJShafer@pplweb.com]			8/9/2017 9:07	RE: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
47	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E163016]	Silverio, Jose E (JESilverio@pplweb.com)[JESilverio@pplweb.com]			8/9/2017 9:07	FW: MAW Communications APPs and Non-compliant Attachments		YANEK_RYAN	Attorney-Client Privilege	Email chain re: two MAW violations for attaching too close to existing facilities
48	Parent	OUTLOOK_MSG	Shafer, Michael J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Frank Wiczowski[frank@mawcom.com]; Brad Gorter[bgorter@pa.gov]; Brent Killian[bkillian@pa.gov]; Kristofer Knittle[kknittle@pa.gov]	Yanek, Ryan J[RJYanek@pplweb.com]; Jeffrey Franklin[JeffreyFranklin@PrinceLaw.com]; Joseph D'Amico[jsdamico@flblaw.com]		12/12/2017 17:07	RE: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		YANEK_RYAN	No Privilege Designation	Email response to MAW and PUC re: safety concerns and NESC violations
49	Parent	OUTLOOK_MSG	Yanek, Ryan J[/O=PPL/OU=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=E163016]	Gelatko, Stephen J (sgelatko@pplweb.com)[sgelatko@pplweb.com]; Reybitz, Ronald J[RJReybitz@pplweb.com]; Bonenberger, David J (djbönenberger@pplweb.com)[djbönenberger@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Frazier, B Kathryn[bkfrazier@pplweb.com]; Santayana, Mark Carl[MCsantayana@pplweb.com]; Baker, Jessica L[JMLong2@pplweb.com]	Shafer, Michael J[MJShafer@pplweb.com]		12/12/2017 17:26	FW: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		YANEK_RYAN	Attorney-Client Privilege	Email chain re: response to MAW and PUC

	A	B	C	D	E	F	G	I	J	K	L	M
50	Parent	OUTLOOK_MSG	Frank Wiczowski[frank@mawcom.com]	Shafer, Michael J[MJShafer@pplweb.com]	Brad Gorter[bgorter@pa.gov]; Brent Killian[bkillian@pa.gov]; Kristofer Knittle[kknittle@pa.gov]; Yaneck, Ryan J[RJYaneck@pplweb.com]; Jeffrey Franklin[JFranklin@PrinceLaw.com]; Joseph D'Amico[jsdamico@flblaw.com]		12/13/2017 17:28	Re: Important -> PPL Alleged Safety Issues Questions -> PUC -> Commitment -> PPL & MAW working together		YANEK_RYAN	No Privilege Designation	Email response to MAW and PUC re: safety concerns and NESC violations
51	Parent	OUTLOOK_MSG	Shafer, Michael J[I/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Joseph D'Amico[jsdamico@flblaw.com]	Yaneck, Ryan J[RJYaneck@pplweb.com]		12/14/2017 15:28	MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email re: PPL interpretation of the NESC
52	Parent	OUTLOOK_MSG	Yaneck, Ryan J[I/O=PPL/OU=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e163016]	Shafer, Michael J[MJShafer@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]			12/14/2017 15:54	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain re: PPL interpretation of the NESC
53	Parent	OUTLOOK_MSG	Shafer, Michael J[I/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Yaneck, Ryan J[RJYaneck@pplweb.com]	Gelatko, Stephen J[sgeatko@pplweb.com]; Joseph S. D'Amico Jr.[jsdamico@flblaw.com]		12/26/2017 13:30	Fwd: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
54	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
55	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
56	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
57	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
58	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
59	Attachment	PDF					12/26/2017 13:30			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
60	Parent	OUTLOOK_MSG	Yaneck, Ryan J[I/O=PPL/OU=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e163016]	Shafer, Michael J[MJShafer@pplweb.com]	Gelatko, Stephen J[sgeatko@pplweb.com]; Joseph S. D'Amico Jr.[jsdamico@flblaw.com]		12/26/2017 14:22	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
61	Parent	OUTLOOK_MSG	Gelatko, Stephen J[I/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=E02305]	Shafer, Michael J[MJShafer@pplweb.com]; Yaneck, Ryan J[RJYaneck@pplweb.com]	Joseph S. D'Amico Jr.[jsdamico@flblaw.com]		12/26/2017 15:28	Re: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain re: PPL interpretation of NESC
62	Parent	OUTLOOK_MSG	Shafer, Michael J[I/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Gelatko, Stephen J[sgeatko@pplweb.com]; Yaneck, Ryan J[RJYaneck@pplweb.com]	Joseph S. D'Amico Jr.[jsdamico@flblaw.com]		12/27/2017 8:24	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
63	Parent	OUTLOOK_MSG	Shafer, Michael J[I/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Yaneck, Ryan J[RJYaneck@pplweb.com]; Gelatko, Stephen J[sgeatko@pplweb.com]; Joseph S. D'Amico Jr.[jsdamico@flblaw.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Santayana, Mark Carl[MCSantayana@pplweb.com]		12/27/2017 9:21	FW: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
64	Parent	OUTLOOK_MSG	Gelatko, Stephen J[I/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=E02305]	Shafer, Michael J[MJShafer@pplweb.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Yaneck, Ryan J[RJYaneck@pplweb.com]		12/27/2017 9:29	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
65	Parent	OUTLOOK_MSG	Yaneck, Ryan J[I/O=PPL/OU=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e163016]	Shafer, Michael J[MJShafer@pplweb.com]	Reybitz, Ronald J[RJReybitz@pplweb.com]; Wirth, Paul G[pgwirth@pplweb.com]; Gelatko, Stephen J[sgeatko@pplweb.com]		12/27/2017 11:50	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC

	A	B	C	D	E	F	G	I	J	K	L	M
66	Parent	OUTLOOK_MSG	Reybitz, Ronald J[/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=E04515]	Yanek, Ryan J[RJYanek@pplweb.com]			12/27/2017 11:52	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
67	Parent	OUTLOOK_MSG	Yanek, Ryan J[/o=PPL/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e163016]	Reybitz, Ronald J[RJReybitz@pplweb.com]			12/27/2017 11:54	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
68	Parent	OUTLOOK_MSG	Reybitz, Ronald J[/O=PPL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=E04515]	Yanek, Ryan J[RJYanek@pplweb.com]			12/27/2017 11:59	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
69	Parent	OUTLOOK_MSG	Yanek, Ryan J[/o=PPL/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=e163016]	Shafer, Michael J[MJShafer@pplweb.com]			12/27/2017 13:43	FW: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
70	Parent	OUTLOOK_MSG	Shafer, Michael J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	'Joseph D'Amico'[jsdamico@fblaw.com]; Yanek, Ryan J[RJYanek@pplweb.com]			12/27/2017 16:16	FW: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
71	Parent	OUTLOOK_MSG	Shafer, Michael J[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E178869]	Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@fblaw.com]; Rippke, Kristie M (Contractor)[KMRRippke@pplweb.com]			3/13/2018 9:44	FW: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
72	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
73	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
74	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
75	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
76	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
77	Attachment	PDF					3/13/2018 9:44			YANEK_RYAN	Attorney-Client Privilege	Attachment to email chain including PPL response to PUC re: interpretation of NESC
78	Parent	OUTLOOK_MSG	Rippke, Kristie M (Contractor)[/O=PPL/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E03466]	Shafer, Michael J[MJShafer@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@fblaw.com]			3/26/2018 14:27	RE: MAW Argument		YANEK_RYAN	Attorney-Client Privilege	Email chain including PPL response to PUC re: interpretation of NESC
79	Attachment	WINWORD2010					3/26/2018 14:27		PPL	YANEK_RYAN	Attorney-Client Privilege; Work Product	Attachment to email chain including PPL response to PUC re: interpretation of NESC
80	Parent	OUTLOOK_MSG	Heather Rivera[hrivera@fblaw.com]	Thomas B. Magee (magee@khlaw.com)[magee@khlaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@fblaw.com]		2/15/2019 9:41	RE: Maw		YANEK_RYAN	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
81	Parent	OUTLOOK_MSG	Magee, Thomas[Magee@khlaw.com]	Heather Rivera[hrivera@fblaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@fblaw.com]		2/15/2019 9:57	RE: Maw		YANEK_RYAN	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines

	A	B	C	D	E	F	G	I	J	K	L	M
82	Parent	OUTLOOK_MSG	Heather Rivera[hrivera@flblaw.com]	Magee, Thomas[Magee@khlaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]		2/15/2019 13:42	RE: Maw		YANEK_RYAN	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
83	Parent	OUTLOOK_MSG	Magee, Thomas[Magee@khlaw.com]	Heather Rivera[hrivera@flblaw.com]	Shafer, Michael J[MJShafer@pplweb.com]; Sweeney, Mallory Jane[MJSweeney@pplweb.com]; Yanek, Ryan J[RJYanek@pplweb.com]; Joseph D'Amico[jsdamico@flblaw.com]		2/15/2019 13:47	RE: Maw		YANEK_RYAN	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines
84	Parent	OUTLOOK_MSG	Sweeney, Mallory Jane[/O=EXCHANGELABS/OU=EXCHAN GE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/C N=07882AE7F9954A92847124F759306 819-SWEENEY, MA]	Yanek, Ryan J[RJYanek@pplweb.com]			2/22/2019 11:57	FW: Maw		YANEK_RYAN	Attorney-Client Privilege	Email chain including Tom Magee re: unauthorized attachments and NESC guidelines

# **EXHIBIT B**

attacher_job_name	ppl_app_no	Why Incomplete	pole_count
NE Franklin Service Drop 5 Camera		Not a valid service drop application. (Too man spans)	15
NE Franklin Service Drop 2		Network tie not defined.	4
NW Lemon/Market Service Drop 2		Network tie not defined.	4
NE Lime Service Drop 2		Not a valid service drop application.	10
SE Howard/Lime Service Drop 1		Network tie not defined.	4
NE Franklin Service Drop 3		Network tie not defined.	8
SW High/Strawberry Service Drop 1		Does not meet our criterion for a service drop application. Appropriate size for an exception, but due to entanglement with other applications. Network tie not defined.	5
NE Shippen Service Drop 1		Not a valid service drop application. (Too man spans)	54
Build 135: LGH Main East	205295	Insufficient Guying plan.	31
Build 124: W-Walnut-N-Market-W-Chestnut	205294	Not on record for all poles.	4
Build 112: N-Plum-E-Ross-N-Lime	205307	Not a relocation project	13
Build 119: College-Columbia-N-W-End	205318	Not a relocation project	6
Build 101: N-Lime-E-James-N-Concord	205259	Not a relocation project	32
NW Lancaster Ave Service Drop 2	205132	Network tie not defined.	6
NW Lancaster Ave Service Drop 1	205133	Network tie not defined.	4
NW Lancaster/James Service Drop 2	205149	Network tie not defined.	5
NW Walnut Service Drop 5	205100	Network tie not defined.	2
Brownstown Loop Section 1	204525	Asked for prints and a legitimate guying plan. This was never resubmitted. (email attached)	93

**AFFIRMATION  
OF  
DARRYL P. PREZIOSI, PE, CEM,  
PPL ELECTRIC UTILITIES CORPORATION**

I, Darryl P. Preziosi, do affirm as follows:

1. My name is Darryl P. Preziosi. I am currently the Manager of the Attachments and Telecom Business Services Department at PPL Electric Utilities Corporation ("PPL"); and
2. I affirm that the information included in PPL's Response to Complainant MAW Communications, Inc.'s Revised First Set of Interrogatories was identified as a result of searches of my files and based upon my personal knowledge.

Executed on May 20, 2019



Darryl P. Preziosi, PE, CEM  
Manager – Attachments and Telecom Business  
Services  
PPL Electric Utilities Corporation



## CERTIFICATE OF SERVICE

I, Timothy A. Doughty, hereby certify that on this 20<sup>th</sup> day of May 2019, a true and authorized copy of PPL Electric Utilities Corporation's Responses to Complainant's Revised First Set of Interrogatories was served on the parties listed below via electronic mail, unless noted otherwise, and was filed with the Commission via ECFS.

Marlene J. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[ecfs@fcc.gov](mailto:ecfs@fcc.gov)  
(By ECFS Only)

Lisa Saks  
Federal Communications Commission  
Enforcement Bureau  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[Lisa.Saks@fcc.gov](mailto:Lisa.Saks@fcc.gov)

Adam Suppes  
Federal Communications Commission  
Enforcement Bureau  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
[Adam.Suppes@fcc.gov](mailto:Adam.Suppes@fcc.gov)

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Washington, DC 20006  
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Davis Wright Tremaine, LLP  
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Washington, DC 20006  
[VanBloys@dwt.com](mailto:VanBloys@dwt.com)

/s/  
Timothy A. Doughty